

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL A. CARTER and MEREDITH CARTER,

Plaintiffs,

-against-

36 HUDSON ASSOCIATES, LLC., JOSEPH PELL
LOMBARDI & ASSOCIATES, ARCHITECTS,
JOSEPH PELL LOMBARDI, TRIBECA 22
INVESTMENT LTD., SERVET HARUNOGLU,
ONURHAN HOMRIS, ADG ARCHITECTURE &
DESIGN, P.C.,

Defendants.

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36 HUDSON ASSOCIATES, LLC.,

Third Party Plaintiff,

-against-

FBR CONSTRUCTION GROUP LLC
And JAY FURMAN,

Fourth party defendants.

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FBR CONSTRUCTION GROUP LLC
And JAY FURMAN,

Fourth Party Plaintiffs,

-against-

L'ABBAYE REAL ESTATE, LLC., DAMO
CONSTRUCTION CO, INC. and ZR
CONTINENTAL CORP.,

Fourth Party Defendants.

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DEMAND FOR NAMES
AND ADDRESSES OF
ALL WITNESSES,
STATEMENTS
AND PHOTOGRAPHS
09-cv-4328(DLC)

PLEASE TAKE NOTICE, that each defendant we represent demands that you set
forth in writing, under oath, and serve upon us within twenty (20) days of this date:

1. The name and address of each person known or claimed by you or any party you represent in this action to be a witness to the occurrence alleged in the Complaint in this action.

2. The name and address of each person known or claimed by you or any party you represent in this action to be a witness with respect to:

- A. Actual notice;
- B. Constructive notice.

3. The names and addresses of each person plaintiff intends to call at the time of trial to present evidence with respect to the issue of damages as to:

- A. Conscious pain and suffering;
- B. Physical disability;
- C. Psychological or other mental disability;
- D. Loss of income; and
- E. Employment disability.

4. True, correct and complete copies of any statements obtained from any defendant herein, whether signed or unsigned, as well as the transcript of any electronically recorded statement taken from said defendant. If the defendant herein is a business entity, true, correct and complete copies of written statements taken from any employee, agent, servant or representative of said defendant, whether signed or unsigned, as well as a transcript of any electronically recorded statement taken from any such individual.

5. Duplicate originals of any and all photographs depicting the accident site as same appeared at or about the time of the incident referred to in this litigation and/or the defective condition complained of, together with the statement as to by whom and when all such photographs were taken.


6. A statement as to the identity of plaintiff's employer as of the date of the incident, plaintiff's employment identification number, if any, and a duly executed authorization permitting defense counsel to obtain complete copies of plaintiff's employment file for a period of ten (10) years prior to this incident.

7. Duplicate originals of any and all photographs depicting the nature and/or extent of plaintiff's injuries and/or any other damages allegedly sustained, which photographs plaintiff intends to seek to offer into evidence at the time of trial.

DATED: White Plains, New York
September 13, 2010

Yours, etc.

HODGES, WALSH & SLATER LLP

By: 

STEPHEN H. SLATER

Attorneys for Fourth Party Defendant

ZR CONTINENTAL CORP.

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TO: COZEN O'CONNOR
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